

UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO

<p>IN RE:</p> <p>THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO, as representative of THE COMMONWEALTH OF PUERTO RICO, et al.</p> <p>Debtors.¹</p>	<p>PROMESA Title III</p> <p>Case No. 17 BK 3283-LTS (Jointly Administered)</p>
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MOTION TO INFORM APPEARANCE OF CANTOR-KATZ COLLATERAL MONITOR, LLC AT OMNIBUS HEARING SCHEDULED FOR MARCH 4-5, 2020

TO THE HONORABLE COURT:

COMES NOW, Cantor-Katz Collateral Monitor, LLC (the “Collateral Monitor”), by and through its undersigned counsel, hereby submits this motion to inform in compliance with this Honorable Court’s *Order Regarding Procedures for Attendance, Participation and Observation of March 4-5, 2020 Omnibus Hearing* [Dkt. No.11729] (the “Hearing Procedures Order”), and respectfully states as follows:

1. Douglas S. Mintz and David Litterine-Kaufman, of Orrick, Herrington & Sutcliffe LLP, will appear in person on behalf of the Collateral Monitor at the Hearing (as defined in the

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (iv) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780 (LTS)) (Last Four Digits of Federal Tax ID: 3747) and (vi) Puerto Rico Building Authority (“PBA”) Bankruptcy Case No.: 19-BK-5523 (LTS) (Last Four Digits of Federal Tax ID: 3801).

Hearing Procedures Order) on March 4-5, 2020 in Courtroom 3 of the United States District Court for the District of Puerto Rico, 150 Carlos Chardón Street, Federal Building, San Juan, Puerto Rico (the “San Juan Courtroom”).

2. Mr. Mintz and/or Mr. Litterine-Kaufman may present argument related to the following documents:

- a. Amended Report and Recommendation of the Mediation Team [Dkt. No. 10756]
- b. DRA Parties' Response to Amended Report and Recommendation of the Mediation Team [Dkt. No. 11495]
- c. DRA Parties' Motion and Memorandum of Law in Support of Their (I) Notice that the DRA Is a Party in Interest and Can Participate in the Monolines' Amended Lift Stay Litigation and Request to Modify the Amended Revenue Bond Scheduling Order or, (II) in the Alternative, Motion to Permit the DRA Parties to Intervene in the Monolines' Amended Lift Stay Litigation [Dkt. No. 10835]
- d. DRA Parties' Motion and Memorandum of Law in Support of Their Motion to Intervene in HTA Revenue Bond Adversary Proceeding with Respect to the Lien Stripping Complaint [Adv. Proc. No. 20-00007, Dkt. No. 14]
- e. DRA Parties' Motion and Memorandum of Law in Support of Their Motion to Intervene in HTA Revenue Bond Adversary Proceeding with Respect to the Clawback Complaint [Adv. Proc. No. 20-00005, Dkt. No. 11]
- f. Joint Stipulation Regarding (I) The DRA Parties' Motion and Memorandum of Law in Support of their Motion for Relief from the Automatic Stay, or in the Alternative, Ordering Payment of Adequate Protection [ECF No.7643]; and (II) The DRA Parties' Motion and Memorandum of Law in Support of their Notice that the DRA

is a Party in Interest and can Participate in the Monolines Amended Lift Stay Litigation [Dkt. No. 11285]

- g. Amended Interim Case Management Order for Revenue Bonds [Dkt. No. 10595]
- h. Joint Motion for an Order (I) Scheduling a Hearing to Consider the Adequacy of Information Contained in the Disclosure Statement, (II) Establishing the Deadline for Filing Spanish Translation of the Disclosure Statement, (III) Establishing the Deadline for Filing Objections to the Disclosure Statement and Replies Thereto, and (IV) Granting Related Relief [Dkt. No. 10808]
- i. Any other related response or pleading thereafter submitted.

3. Mr. Mintz and/or Mr. Litterine-Kaufman, on behalf of the Collateral Monitor, also reserve the right to address the Court with respect to (i) any other matter set forth in the Agenda to be filed by the Oversight Board, and (ii) any statements made at the Hearing by any party in connection with the above-captioned Title III cases.

4. Carmen D. Conde Torres, Esq. and Luisa S. Valle Castro, Esq. will attend the hearing and be seated at in the San Juan courtroom.

WHEREFORE, for the foregoing reasons, the Collateral Monitor respectfully requests that this Honorable Court take notice of its compliance with the Hearing Procedures Order.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 28th day of February 2020.

WE HEREBY CERTIFY that on this date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System, which will send notification of such filing to the parties appearing in said system including the US Trustee and to all those parties registered to receive notice within the electronic notification service.

/s/Carmen D. Conde Torres
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/s/ Douglas S. Mintz
Douglas S. Mintz, Esq.
(admitted pro hac vice)

/s/ David Litterine-Kaufman
David Litterine -Kaufman
(pro hac vice admission pending)

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